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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,	)	No. CV-26-_____
	)	
Plaintiff,	)	
	)	
v.	)	COMPLAINT TO REVOKE
	)	NATURALIZATION
Tania Rahman Murad a/k/a Luna Zaman,	)	
	)	
Defendant.	)	
_____	)	

The United States of America brings this action against Tania Rahman Murad a/k/a Luna Zaman to revoke her naturalized United States citizenship under 8 U.S.C. § 1451(a). Ms. Murad/Zaman illegally procured her naturalization and willfully misrepresented and concealed material facts in applying to naturalize.

I. PRELIMINARY STATEMENT OF THE CASE

In 1991, an immigration judge denied Ms. Murad/Zaman's application for an immigration benefit, which she submitted under the identity Luna Zaman. After Ms. Murad/Zaman's appeal was remanded, the immigration judge in 1999 ordered her to be deported from the United States. She failed to surrender for deportation, and there is no evidence that she departed the United States as ordered.

1 In 1996, Ms. Murad/Zaman sought lawful permanent residence as the spouse of
2 Murad Muraduzzaman using a different identity (Tania Rahman Murad). This application
3 was approved in 1998, and she naturalized as a United States citizen under the name Tania
4 Murad in 2006. Fingerprint comparisons confirm that both identities — Luna Zaman and
5 Tania Murad — belong to Ms. Murad/Zaman.

6 Throughout her naturalization proceedings, Ms. Murad/Zaman failed to disclose
7 that she (1) had used a prior identity, including a different name and date of birth, and (2)
8 had been ordered deported under that identity. Ms. Murad/Zaman's false statements and
9 misrepresentations cut off lines of questioning into issues that would have disqualified her
10 from adjustment. Therefore, Ms. Murad/Zaman was not lawfully admitted as a permanent
11 resident and, therefore, was not eligible for naturalization. Ms. Murad/Zaman also was
12 not eligible for naturalization because she was not able to demonstrate the required good
13 moral character given that she falsely testified about her identity and immigration status in
14 naturalization interviews.

15 In addition, while subject to the deportation order, Ms. Murad/Zaman left the
16 United States and traveled to Bangladesh. She returned approximately 29 days later. Due
17 to her international travel, Ms. Murad/Zaman was inadmissible from May 2000 (the date
18 she departed the United States while subject to the deportation order) until and including
19 May 2010 (10 years after the date she departed the United States). Thus, Ms.
20 Murad/Zaman was inadmissible when she naturalized in May 2006.

21 Because Ms. Murad/Zaman was not eligible for naturalization, she illegally
22 procured her United States citizenship and, therefore, her naturalization is subject to
23 revocation under 8 U.S.C. § 1451(a). Ms. Murad/Zaman's concealment of material facts
24 and willful misrepresentations in naturalization proceedings constitute an additional
25 ground requiring the revocation of her naturalization.

26 Ms. Murad/Zaman's actions and conduct statutorily barred her from becoming a
27 United States citizen and render her naturalization unlawfully procured. Additionally,
28 they demonstrate that she procured her naturalization by concealment and willful

misrepresentation. Accordingly, based on the attached exhibits, including the affidavit showing good cause, the United States respectfully requests that the Court (1) revoke and set aside the order admitting Ms. Murad/Zaman to citizenship; (2) cancel her certificate of naturalization; and (3) award other appropriate relief.

II. PARTIES, JURISDICTION, AND VENUE

1. Plaintiff is the United States of America.

2. Defendant is Tania Rahman Murad a/k/a Luna Zaman, who is a native of Bangladesh and a naturalized United States citizen.

3. Tania Rahman Murad and Luna Zaman are one and the same person.

4. This is an action under 8 U.S.C. § 1451(a) to revoke and set aside the order admitting Ms. Murad/Zaman to United States citizenship and to cancel her Certificate of Naturalization No. 

5. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1345 for a cause of action under 8 U.S.C. § 1451(a).

6. Venue is proper in this District under 8 U.S.C. § 1451(a) and 28 U.S.C. § 1391 because Ms. Murad/Zaman resides in this judicial district.

III. FACTUAL ALLEGATIONS

7. Attached hereto and incorporated herein by reference as Exhibit A is an Affidavit of Good Cause signed by Melanie Medina, Immigration Services Officer, United States Citizenship and Immigration Services (“USCIS”), United States Department of Homeland Security (“DHS”), showing good cause for this action as required by 8 U.S.C. § 1451(a).

A. The “Luna Zaman” Identity

8. On August 23, 1990, Ms. Murad/Zaman was encountered by a United States Border Patrol agent in Las Vegas, Nevada. (Exhibit A, ¶ 1.)

9. Upon questioning, Ms. Murad/Zaman informed the agent that her name was Luna Zaman. (Exhibit A, ¶ 1.)

1 10. Upon questioning, Ms. Murad/Zaman informed the agent that she was born
2 in Bangladesh on a certain date. (Exhibit A, ¶ 1.)

3 11. For privacy purposes, that date is described in this Complaint and in the
4 affidavit of good cause as Month 1, Date 1, Year 1. (Exhibit A, ¶ 1.)

5 12. Ms. Murad/Zaman indicated that she last entered the United States by
6 crossing the U.S.-Mexican border near California in January 1981. (Exhibit A, ¶ 1.)

7 13. The same day, August 23, 1990, the Immigration and Naturalization
8 Service (“INS”)¹ personally served Ms. Murad/Zaman with a Form I-221, Order to Show
9 Cause (“OSC”), Notice of Hearing, and Warrant for Arrest of Alien. (Exhibit A, ¶ 2.)

10 14. A true and accurate copy of Ms. Murad/Zaman’s Form I-221 is attached as
11 Exhibit B (with personally identifiable information redacted).

12 15. The Form I-221 charged Ms. Murad/Zaman as deportable on the basis of
13 having entered the United States without inspection. (Exhibit A, ¶ 2; Exhibit B.)

14 16. The Form I-221 indicated that Ms. Murad/Zaman would be notified of the
15 date, time, and place of her immigration court hearing, once scheduled. (Exhibit A, ¶ 1;
16 Exhibit B.)

17 17. On January 16, 1991, Ms. Murad/Zaman appeared for her initial hearing.
18 (Exhibit A, ¶ 3.)

19 18. On February 22, 1991, Ms. Murad/Zaman, through her counsel, asked the
20 court to consolidate her case with that of her husband, Rahman Zaman, who was also in
21 deportation proceedings. (Exhibit A, ¶ 4.)

22 19. The immigration judge granted the motion for consolidation. (Exhibit A, ¶
23 4.)

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25
26 ¹ On March 1, 2003, the INS ceased to exist, and many of its relevant functions
27 transferred to DHS and its sub-agencies, including United States Citizenship and
28 Immigration Services (“USCIS”). *See* Homeland Security Act of 2002, Pub. L. No. 107-
296, 110 Stat. 2135 (Nov. 25, 2002). The United States references “INS” or “USCIS”
where factually appropriate.

1 20. During the consolidated hearing on March 27, 1991, Ms. Murad/Zaman
2 admitted to the factual allegations and the charge of deportability on the OSC, except that
3 the date of entry was changed from January 1981 to December 1980. (Exhibit A, ¶ 5.)

4 21. Ms. Murad/Zaman also informed the immigration judge that she had a
5 pending application for an immigration benefit with INS. (Exhibit A, ¶ 5.)

6 22. The immigration judge continued the case to allow Ms. Murad/Zaman to
7 provide evidence of her pending application. (Exhibit A, ¶ 5.)

8 23. On April 11, 1991, Ms. Murad/Zaman's counsel submitted to the
9 immigration court evidence of her application. (Exhibit A, ¶ 6.)

10 24. The immigration judge granted a 90-day continuance, to July 2, 1991, to
11 allow INS an opportunity to adjudicate the application. (Exhibit A, ¶ 6.)

12 25. On July 8, 1991, Ms. Murad/Zaman's counsel notified the court that her
13 application remained pending due to a related lawsuit. (Exhibit A, ¶ 7.)

14 26. Ms. Murad/Zaman's counsel, instead, filed an application for relief from
15 deportation for her and her husband. (Exhibit A, ¶ 7.)

16 27. On September 27, 1991, the immigration judge denied the application for
17 relief and granted Ms. Murad/Zaman and her husband voluntary departure. (Exhibit A, ¶
18 8.)

19 28. Ms. Murad/Zaman and her husband were given until October 31, 1991, to
20 voluntarily depart the United States to Bangladesh. (Exhibit A, ¶ 8.)

21 29. On October 3, 1991, Ms. Murad/Zaman and her husband filed a Notice of
22 Appeal to the Board of Immigration Appeals ("BIA"). (Exhibit A, ¶ 9.)

23 30. On September 30, 1998, the BIA remanded the case to the immigration
24 judge. (Exhibit A, ¶ 10.)

25 31. On February 1, 1998, Ms. Murad/Zaman was scheduled to appear for
26 hearing at the immigration court. (Exhibit A, ¶ 11.)

27 32. Ms. Murad/Zaman failed to appear. (Exhibit A, ¶ 11.)

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1 33. The immigration judge reset the hearing for March 1, 1999. (Exhibit A, ¶
2 11.)

3 34. On March 1, 1999, Ms. Murad/Zaman again failed to appear for her
4 hearing. (Exhibit A, ¶ 11.)

5 35. The immigration judge ordered Ms. Murad/Zaman deported in absentia.
6 (Exhibit A, ¶ 11.)

7 36. A true and accurate copy of the deportation order is attached as Exhibit C
8 (with personally identifiable information redacted).

9 37. USCIS has no record that Ms. Murad/Zaman departed the United States
10 pursuant to the court's order.

11 **B. The "Tania Murad" Identity**

12 38. On July 31, 1996, Ms. Murad/Zaman, using the name Tania Rahman
13 Murad, filed Form I-485, Application to Register Permanent Residence or Adjust Status,
14 with INS. (Exhibit A, ¶ 14.)

15 39. A true and accurate copy of Ms. Murad/Zaman's Form I-485 is attached as
16 Exhibit D (with personally identifiable information redacted).

17 40. On her Form I-485, signed under penalty of perjury, Ms. Murad/Zaman
18 represented that her name was Tania Rahman Murad. (Exhibit A, ¶ 15; Exhibit D.)

19 41. On her Form I-485, signed under penalty of perjury, Ms. Murad/Zaman
20 represented that she was born in Bangladesh on the same day of the month as she had
21 represented before under the identity Luna Zaman (Day 1) but in a different month
22 (Month 2) and in a different year (Year 2) (*i.e.*, Month 2, Day 1, Year 2). (Exhibit A, ¶
23 15; Exhibit D.)

24 42. On her Form I-485, signed under penalty of perjury, Ms. Murad/Zaman
25 represented that she last arrived in the United States on August 12, 1989. (Exhibit A, ¶
26 15; Exhibit D.)

27 43. On her Form I-485, signed under penalty of perjury, Ms. Murad/Zaman
28 represented that she had never been deported from the United States, removed from the

1 United States at government expense, or excluded within the past year and was not then in
2 exclusion or deportation proceedings. (Exhibit A, ¶ 15; Exhibit D.)

3 44. On her Form I-485, signed under penalty of perjury, Ms. Murad/Zaman
4 represented that she never sought by fraud, or willful misrepresentation of a material fact,
5 to procure, or procured, a visa, other documentation, entry into the United States, or any
6 other immigration benefit. (Exhibit A, ¶ 15; Exhibit D.)

7 45. In support of her Form I-485, Ms. Murad/Zaman filed a Form G-325A,
8 Biographic Information, which she signed on March 11, 1996, under severe penalties for
9 knowingly and willfully falsifying or concealing a material fact. (Exhibit A, ¶ 16.)

10 46. A true and accurate copy of Ms. Murad/Zaman's Form G-325A is attached
11 as Exhibit E (with personally identifiable information redacted).

12 47. In her Form G-325A, Ms. Murad/Zaman represented that her name was
13 Tania Rahman Murad. (Exhibit A, ¶ 16; Exhibit E.)

14 48. In her Form G-325A, Ms. Murad/Zaman represented that she was born in
15 Bangladesh on the same day of the month as she had represented before under the identity
16 Luna Zaman (Day 1) but in a different month (Month 2) and in a different year (Year 2)
17 (*i.e.*, Month 2, Day 1, Year 2). (Exhibit A, ¶ 16; Exhibit E.)

18 49. In her Form G-325A, Ms. Murad/Zaman represented that she had used no
19 other names. (Exhibit A, ¶ 16; Exhibit E.)

20 50. Ms. Murad/Zaman filed a Form I-485 Supplement A, Adjustment of Status
21 under 245(i), which she signed on March 11, 1996, under penalty of perjury. (Exhibit A,
22 ¶ 17; Exhibit F.)

23 51. A true and accurate copy of Ms. Murad/Zaman's Form I-485 Supplement A
24 is attached as Exhibit F (with personally identifiable information redacted).

25 52. In the Form I-485 Supplement A, Ms. Murad/Zaman represented under
26 penalty of perjury that her name was Tania Rahman Murad. (Exhibit A, ¶ 17; Exhibit F.)

27 53. In the Form I-485 Supplement A, Ms. Murad/Zaman represented under
28 penalty of perjury that she was born in Bangladesh on the same day of the month as she

1 had represented before under the identity Luna Zaman (Day 1) but in a different month
2 (Month 2) and in a different year (Year 2) (*i.e.*, Month 2, Day 1, Year 2). (Exhibit A, ¶
3 17; Exhibit F.)

4 54. On August 21, 1997, Ms. Murad/Zaman was interviewed for her
5 adjustment of status application. (Exhibit A, ¶ 18.)

6 55. On December 12, 1998, INS approved the Form I-485 and Ms.
7 Murad/Zaman was granted lawful permanent resident status. (Exhibit A, ¶ 19.)

8 56. In May 2000, Ms. Murad/Zaman departed the United States, traveled to
9 Bangladesh, and returned to the United States. (Exhibit G.)

10 57. On or about October 5, 2005, Ms. Murad/Zaman filed with USCIS a Form
11 N-400, Application for Naturalization, based upon her representation of having been a
12 lawful permanent resident for a period of five years. (Exhibit A, ¶ 20.)

13 58. A true and accurate copy of Ms. Murad/Zaman's Form N-400 is attached as
14 Exhibit G (with personally identifiable information redacted).

15 59. Ms. Murad/Zaman signed her N-400, certifying under penalty of perjury
16 that its contents, and the evidence submitted with it, are true and correct. (Exhibit A, ¶ 20;
17 Exhibit G.)

18 60. On her Form N-400, Ms. Murad/Zaman represented that her current legal
19 name was Tania Rahman Murad. (Exhibit A, ¶ 20; Exhibit G.)

20 61. On her Form N-400, Ms. Murad/Zaman represented that she had also used
21 the name Tania Rahman but no other names. (Exhibit A, ¶ 20; Exhibit G.)

22 62. On her Form N-400, Ms. Murad/Zaman represented that she had been a
23 lawful permanent resident of the United States for at least five years. (Exhibit A, ¶ 20;
24 Exhibit G.)

25 63. On her Form N-400, Ms. Murad/Zaman represented that she was born in
26 Bangladesh on the same day of the month as she had represented before under the identity
27 Luna Zaman (Day 1) but in a different month (Month 2) and in a different year (Year 2)
28 (*i.e.*, Month 2, Day 1, Year 2). (Exhibit A, ¶ 20; Exhibit G.)

1 64. On her Form N-400, Ms. Murad/Zaman represented that she had never
2 committed a crime or offense for which she was not arrested. (Exhibit A, ¶ 20; Exhibit
3 G.)

4 65. On her Form N-400, Ms. Murad/Zaman represented that she had never
5 given false or misleading information to any United States Government official while
6 applying for any immigration benefit or to prevent deportation, exclusion, or removal.
7 (Exhibit A, ¶ 20; Exhibit G.)

8 66. On her Form N-400, Ms. Murad/Zaman represented that she had never lied
9 to any U.S. Government official to gain entry or admission into the United States.
10 (Exhibit A, ¶ 20; Exhibit G.)

11 67. On her Form N-400, Ms. Murad/Zaman represented that no removal,
12 exclusion, recission, or deportation proceedings were pending against her. (Exhibit A, ¶
13 20; Exhibit G.)

14 68. On her Form N-400, Ms. Murad/Zaman represented that she had never
15 been ordered to be removed, excluded, or deported from the United States. (Exhibit A, ¶
16 20; Exhibit G.)

17 69. On her Form N-400, Ms. Murad/Zaman represented that she had never
18 applied for any kind of relief from removal, exclusion, or deportation. (Exhibit A, ¶ 20;
19 Exhibit G.)

20 70. On her Form N-400, Ms. Murad/Zaman represented that she departed the
21 United States in May 2000; traveled to Bangladesh; and returned to the United States 29
22 days later. (Exhibit G.)

23 71. On March 30, 2006, Ms. Murad/Zaman appeared for an interview at the
24 Phoenix Field Office to determine her eligibility for naturalization. (Exhibit A, ¶ 21.)

25 72. During the interview, a USCIS employee placed Ms. Murad/Zaman under
26 oath and asked Ms. Murad/Zaman to confirm her written answer to Part 1, Question A,
27 asking for her “current legal name.” (Exhibit A, ¶ 21.)

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1 73. In response to that question, Ms. Murad/Zaman testified, orally and under
2 oath, that her name was Tania Rahman Murad, consistent with her earlier written answer
3 to Part 1, Question A, of her Form N-400. (Exhibit A, ¶ 22.)

4 74. During the interview, the USCIS employee asked Ms. Murad/Zaman
5 whether she had used any other names, consistent with her earlier written answer to Part 1,
6 Question C, of her Form N-400. (Exhibit A, ¶ 21.)

7 75. In response to that question, Ms. Murad/Zaman testified, orally and under
8 oath, that the only other name she had ever used was Tania Rahman, consistent with her
9 earlier written answer to Part 1, Question C, of her Form N-400. (Exhibit A, ¶ 22.)

10 76. During the interview, the USCIS employee asked Ms. Murad/Zaman
11 whether she had been a lawful permanent resident of the United States for at least five
12 years, consistent with her earlier written answer to Part 2, Question A, of her Form N-400.
13 (Exhibit A, ¶ 23.)

14 77. In response to that question, Ms. Murad/Zaman testified, orally and under
15 oath, that she had been a lawful permanent resident of the United States for at least five
16 years, consistent with her earlier written answer to Part 2, Question A, of her Form N-400.
17 (Exhibit A, ¶ 23.)

18 78. During the interview, the USCIS employee asked Ms. Murad/Zaman
19 whether she had ever given false or misleading information to any U.S. Government
20 official while applying for any immigration benefit or to prevent deportation, exclusion, or
21 removal, consistent with her earlier written answer to Part 10, Section D, Question 23, of
22 her Form N-400. (Exhibit A, ¶ 21.)

23 79. In response to that question, Ms. Murad/Zaman testified, orally and under
24 oath, in the negative, consistent with her earlier written answer to Part 10, Section D,
25 Question 23, of her Form N-400. (Exhibit A, ¶ 22.)

26 80. During the interview, the USCIS employee asked Ms. Murad/Zaman
27 whether she had ever lied to any United States Government official to gain entry or
28 admission to the United States, consistent with her earlier written answer to Part 10,

1 Section D, Question 24, of her Form N-400. (Exhibit A, ¶ 21.)

2 81. In response to that question, Ms. Murad/Zaman testified, orally and under
3 oath, in the negative, consistent with her earlier written answer to Part 10, Section D,
4 Question 24, of her Form N-400. (Exhibit A, ¶ 22.)

5 82. During the naturalization interview, five corrections were made to the
6 written answers initially provided on Ms. Murad/Zaman's Form N-400. (Exhibit A, ¶ 24.)

7 83. At the conclusion of the interview, Ms. Murad/Zaman swore that the
8 contents of her Form N-400, including the five corrections, were true and correct.
9 (Exhibit A, ¶ 24.)

10 84. On March 30, 2006, based on her written application and the testimony she
11 provided during her naturalization interview, Ms. Murad/Zaman's Form N-400 was
12 approved. (Exhibit A, ¶ 25.)

13 85. On April 21, 2006, Ms. Murad/Zaman took the Oath of Allegiance.
14 (Exhibit A, ¶ 25.)

15 86. Ms. Murad/Zaman was issued Certificate of Naturalization No. 
16 (Exhibit A, ¶ 25; Exhibit H.)

17 87. A true and accurate copy of Ms. Murad/Zaman's Certificate of
18 Naturalization is attached as Exhibit H (with personally identifiable information redacted).

19 88. Ms. Murad/Zaman was admitted as a citizen of the United States "pursuant
20 to an application filed with the Secretary of Homeland Security." (Exhibit H.)

21 89. Ms. Murad/Zaman was admitted as a citizen of the United States based on
22 the Secretary of Homeland Security's finding that Ms. Murad/Zaman "had in all ...
23 respects complied with the applicable provisions of" the "Naturalization Laws of the
24 United States." (Exhibit H.)

25 90. The Secretary of Homeland Security's finding was premised on Ms.
26 Murad/Zaman's concealment of material facts and willful misrepresentations in her
27 naturalization application and throughout her naturalization process.

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1 **C. The Two Identities Belong to Defendant**

2 91. Ms. Murad/Zaman submitted fingerprint impressions as part of her
3 application for immigration benefits under the Luna Zaman identity. (Exhibit I.)

4 92. Ms. Murad/Zaman submitted fingerprint impressions as part of her
5 application for immigration benefits under the Tania Rahman Murad identity. (Exhibit I.)

6 93. On August 5, 2026, a USCIS fingerprint specialist conducted a fingerprint
7 impression comparison for the fingerprints submitted under the Tania Rahman Murad
8 identity and the Luna Zaman identity. (Exhibit I.)

9 94. A true and accurate copy of the fingerprint specialist's report is attached as
10 Exhibit I (with personally identifiable information redacted).

11 95. The fingerprint specialist concluded that the impressions examined were
12 made by the same individual. (Exhibit I.)

13 96. The fingerprints submitted under the Tania Rahman Murad identity and the
14 fingerprints submitted under the Luna Zaman identity were submitted by the same person.
15 (Exhibit I.)

16 **V. GOVERNING LAW**

17 **A. Congressionally Imposed Prerequisites to the Acquisition of Citizenship**

18 97. “No alien has the slightest right to naturalization unless all statutory
19 requirements are complied with; and every certificate of citizenship must be treated as
20 granted upon condition that the government may challenge it, as provided [by statute], and
21 demand its cancelation unless issued in accordance with such requirements.” *United*
22 *States v. Ginsberg*, 243 U.S. 472, 474-75 (1917).

23 98. The Supreme Court has underscored that “[t]here must be strict compliance
24 with all the congressionally imposed prerequisites to the acquisition of citizenship.”
25 *Fedorenko v. United States*, 449 U.S. 490, 506 (1981).

26 99. The Supreme Court has also emphasized that “[a]n alien who seeks
27 political rights as a member of this Nation can rightfully obtain them only upon the terms
28 and conditions specified by Congress...” *Id.* (quoting *Ginsberg*, 243 U.S. at 474).

1 100. Citizenship is “illegally procured” if the applicant failed to comply with
2 any of the congressionally imposed prerequisites to the acquisition of citizenship.
3 *Fedorenko*, 449 U.S. at 506.

4 101. Among other requirements for naturalization, Congress mandated that an
5 applicant for naturalization must demonstrate that he or she has been “*lawfully* admitted”
6 to the United States “for permanent residence.” 8 U.S.C. § 1427(a)(1) (emphasis
7 added); *see also* 8 U.S.C. § 1429.

8 102. The term “lawfully admitted for permanent residence” means “the status of
9 having been lawfully accorded the privilege of residing permanently in the United States
10 as an immigrant in accordance with the immigration laws, such status not having
11 changed.” 8 U.S.C. § 1101(a)(20).

12 103. Admission is not lawful if it is regular only in form, and “lawfully
13 admitted” denotes “compliance with substantive legal requirements, not mere procedural
14 regularity.” *Monet v. I.N.S.*, 791 F.2d 752, 753 (9th Cir. 1986) (citation omitted).

15 104. Thus, because “‘lawfully’ denotes compliance with substantive legal
16 requirements, not mere procedural regularity, an alien is not ‘lawfully’ admitted for
17 permanent resident status if, at the time such status was accorded, he or she was not
18 entitled to it.” *United States v. Amintobia*, 57 F.4th 687, 700 (9th Cir. 2023) (quoting
19 *Kyong Ho Shin v. Holder*, 607 F.3d 1213, 1217 (9th Cir. 2010) (cleaned up).

20 105. Congress mandated that an individual may not naturalize unless that person
21 “during all periods referred to in [8 U.S.C. § 1427(a)] has been and still is a person of
22 good moral character.” 8 U.S.C. § 1427(a).

23 106. The required statutory period for good moral character begins five years
24 before the date the applicant files the application for naturalization and continues until the
25 applicant takes the oath of allegiance and becomes a United States citizen. 8 U.S.C.
26 § 1427(a); 8 C.F.R. § 316.10(a).

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1 107. Congress has explicitly precluded individuals who give false testimony
2 during the statutory period for the purpose of obtaining immigration benefits from being
3 able to establish the good moral character necessary to naturalize. 8 U.S.C. § 1101(f)(6).

4 108. Congress also created a “catch-all” provision, which states, “[t]he fact that
5 any person is not within any of the [statutorily described] classes shall not preclude a
6 finding that for other reasons such person is or was not of good moral character.”
7 8 U.S.C. § 1101(f).

8 109. Thus, individuals who commit unlawful acts adversely reflecting upon their
9 moral character cannot meet the good moral character requirement, unless they prove that
10 extenuating circumstances exist. *See* 8 U.S.C. § 1101(f); 8 C.F.R. § 316.10(b)(3)(iii).

11 **B. The Denaturalization Statute**

12 110. Congress enacted 8 U.S.C. § 1451 to address situations in which an
13 individual has naturalized despite failing to comply with all congressionally imposed
14 prerequisites to the acquisition of citizenship or by concealing or misrepresenting facts
15 that are material to the decision on whether to grant his or her naturalization application.

16 111. Under 8 U.S.C. § 1451(a), an order of naturalization is subject to revocation
17 and a certificate of naturalization is subject to cancellation if naturalization was *either*
18 illegally procured *or* procured by concealment of a material fact or by willful
19 misrepresentation.

20 112. Failure to comply with any of the congressionally imposed prerequisites to
21 the acquisition of citizenship renders the citizenship “illegally procured.” *Fedorenko*, 449
22 U.S. at 506.

23 113. Naturalization was procured by concealment of a material fact or by willful
24 misrepresentation, where: (1) the naturalized citizen misrepresented or concealed some
25 fact during the naturalization process; (2) the misrepresentation or concealment was
26 willful; (3) the fact was material; and (4) the naturalized citizen procured citizenship as a
27 result of the misrepresentation or concealment. *Kungys v. United States*, 485 U.S. 759,
28 767 (1988).

114. Where the United States establishes that the defendant's citizenship was procured illegally or by concealment of a material fact or by willful misrepresentation, "district courts lack equitable discretion to refrain from entering a judgment of denaturalization." *Fedorenko*, 449 U.S. at 517.

VI. CAUSES OF ACTION

COUNT I

ILLEGAL PROCUREMENT OF NATURALIZATION

**Not Lawfully Admitted for Permanent Residence
(Fraud or Willful Misrepresentation of a Material Fact)**

115. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I through V of this Complaint.

116. Ms. Murad/Zaman was not qualified for naturalization because she was not lawfully admitted to the United States for permanent residence. 8 U.S.C. § 1427(a)(1); 8 U.S.C. § 1429.

117. The term “lawfully” requires compliance with substantive legal requirements for admission and not mere procedural regularity. *See Amintobia*, 57 F.4th at 700; *Monet*, 791 F.2d at 752-53.

118. An alien may not lawfully adjust status to permanent resident if she is inadmissible. 8 U.S.C. § 1255(a)(2).

119. An alien is inadmissible if he or she, by fraud or willfully misrepresenting a material fact, seeks to procure, has sought to procure, or has procured a visa, other documentation, or admission into the United States or other benefit provided for in the INA. 8 U.S.C. § 1182(a)(6)(C)(i).

120. Ms. Murad/Zaman was inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i) at the time of her adjustment to permanent resident status, because she both sought to procure, and did procure, admission into the United States or other immigration benefits by fraud or by willfully misrepresenting material facts.

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1 121. Ms. Murad/Zaman sought to procure admission into the United States
2 or another immigration benefit by fraud or by willfully misrepresenting material
3 facts in her naturalization application that she submitted on or about October 5, 2005.

4 122. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
5 admission into the United States or other immigration benefits by fraudulently or willfully
6 misrepresenting that her name was Tania Rahman Murad.

7 123. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
8 admission into the United States or other immigration benefits by fraudulently or willfully
9 misrepresenting that she never used any names other than Tania Rahman Murad and Tania
10 Rahman.

11 124. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
12 admission into the United States or other immigration benefits by fraudulently or willfully
13 misrepresenting that she had been a lawful permanent resident of the United States for at
14 least five years.

15 125. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
16 admission into the United States or other immigration benefits by fraudulently or willfully
17 misrepresenting that she was born on the same day of the month as she had represented
18 before under the identity Luna Zaman (Day 1) but in a different month (Month 2) and in a
19 different year (Year 2) (*i.e.*, Month 2, Day 1, Year 2).

20 126. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
21 admission into the United States or other immigration benefits by fraudulently or willfully
22 misrepresenting that she had never committed a crime or offense for which she was not
23 arrested.

24 127. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
25 admission into the United States or other immigration benefits by fraudulently or willfully
26 misrepresenting that she had never given false or misleading information to any U.S.
27 government official while applying for any immigration benefit or to prevent deportation,
28 exclusion, or removal.

1 128. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
2 admission into the United States or other immigration benefits by fraudulently or willfully
3 misrepresenting that she had never lied to any U.S. government official to gain entry or
4 admission into the United States.

5 129. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
6 admission into the United States or other immigration benefits by fraudulently or willfully
7 misrepresenting that no removal, exclusion, recission, or deportation proceedings were
8 pending against her.

9 130. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
10 admission into the United States or other immigration benefits by fraudulently or willfully
11 misrepresenting that she had never been ordered to be removed, excluded, or deported
12 from the United States.

13 131. As set forth above, Ms. Murad/Zaman sought to procure, and did procure,
14 admission into the United States or other immigration benefits by fraudulently or willfully
15 misrepresenting that she had never applied for any kind of relief from removal, exclusion,
16 or deportation.

17 132. Therefore, at the time Ms. Murad/Zaman was admitted as a permanent
18 resident, she was inadmissible pursuant to 8 U.S.C. § 1182(a)(6)(C)(i).

19 133. Ms. Murad/Zaman's false statements regarding her name, her date of birth,
20 her commission of crimes or offenses, and her immigration history were material to
21 determining her eligibility for the immigration benefits for which she applied.

22 134. Ms. Murad/Zaman's false statements had the natural tendency to influence
23 a decision through which she gained her permanent resident status and her naturalization.

24 135. Ms. Murad/Zaman, thus, sought to procure an immigration benefit by fraud
25 or willfully misrepresenting material facts, rendering her inadmissible at the time her
26 status was adjusted to that of a permanent resident.

27 136. Because Ms. Murad/Zaman was inadmissible when her status was adjusted
28 to that of a permanent resident, she was not lawfully admitted for permanent residence.

137. Because Ms. Murad/Zaman was not lawfully admitted for permanent residence, she was and remains ineligible for naturalization under 8 U.S.C. § 1429.

138. Because Ms. Murad/Zaman was ineligible for naturalization, she illegally procured her naturalization.

139. Because Ms. Murad/Zaman illegally procured her naturalization, her naturalization is subject to revocation under 8 U.S.C. § 1451(a).

COUNT II

ILLEGAL PROCUREMENT OF NATURALIZATION

Lack of Good Moral Character (False Testimony)

140. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I through V of this Complaint.

141. Ms. Murad/Zaman illegally procured her naturalization because she was statutorily precluded from establishing the good moral character necessary to naturalize on account of her providing false testimony for the purpose of obtaining an immigration benefit.

142. As discussed above, an applicant for naturalization must satisfy the statutory requirement of demonstrating that she is a person of good moral character for the five-year statutory period before she filed her naturalization application and until she becomes a naturalized United States citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(1).

143. On or about October 5, 2005, Ms. Murad/Zaman filed her Form N-400, Application for Naturalization; and she naturalized on April 21, 2006.

144. Thus, to be eligible for naturalization, Ms. Murad/Zaman was required to establish that she was a person of good moral character during her “statutory period” of from October 5, 2000 (five years prior to October 5, 2005), and April 21, 2006.

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1 145. Ms. Murad/Zaman was statutorily barred from establishing the good moral
2 character necessary to naturalize because, during the statutory period, she provided false
3 testimony, orally and under oath, for the purpose of obtaining an immigration benefit,
4 including naturalization. *See* 8 U.S.C. § 1101(f)(6).

5 146. As set forth above, during the statutory period, Ms. Murad/Zaman provided
6 false testimony for the purpose of obtaining an immigration benefit when she swore,
7 orally and under oath, during her naturalization interview on March 30, 2006, that her
8 name was Tania Rahman Murad.

9 147. As set forth above, during the statutory period, Ms. Murad/Zaman provided
10 false testimony for the purpose of obtaining an immigration benefit when she swore,
11 orally and under oath, during her naturalization interview on March 30, 2006, that the only
12 other name she had ever used was Tania Rahman.

13 148. As set forth above, during the statutory period, Ms. Murad/Zaman provided
14 false testimony for the purpose of obtaining an immigration benefit when she swore,
15 orally and under oath, during her naturalization interview on March 30, 2006, that she had
16 been a lawful permanent resident of the United States for at least five years.

17 149. As set forth above, during the statutory period, Ms. Murad/Zaman provided
18 false testimony for the purpose of obtaining an immigration benefit when she swore,
19 orally and under oath, during her naturalization interview on March 30, 2006, that she had
20 never given false or misleading information to any U.S. Government official while
21 applying for any immigration benefit or to prevent deportation, exclusion, or removal.

22 150. As set forth above, during the statutory period, Ms. Murad/Zaman provided
23 false testimony for the purpose of obtaining an immigration benefit when she swore,
24 orally and under oath, during her naturalization interview on March 30, 2006, that she had
25 never lied to any U.S. Government official to gain entry or admission to the United States.

26 151. Ms. Murad/Zaman's testimony on each of the questions discussed above
27 was oral, under oath, knowingly false, and for the purpose of obtaining an immigration
28 benefit, namely, naturalization.

152. Because she provided false testimony orally and under oath for the purpose of obtaining her naturalization, Ms. Murad/Zaman was barred under 8 U.S.C. § 1101(f)(6) from showing that she had the good moral character necessary to become a naturalized United States citizen.

153. Because Ms. Murad/Zaman was not a person of good moral character, she was ineligible for naturalization under 8 U.S.C. § 1427(a)(3).

154. Because she was ineligible to naturalize, Ms. Murad/Zaman procured her citizenship illegally.

155. Because she procured her citizenship illegally, her citizenship is subject to revocation under 8 U.S.C. § 1451(a).

COUNT III

ILLEGAL PROCUREMENT OF NATURALIZATION

Lack of Good Moral Character

(Unlawful Acts Adversely Reflecting Moral Character with No Extenuating Circumstances)

156. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I through V of this Complaint.

157. As outlined above, to be eligible for naturalization, Congress has mandated that an applicant must show that he or she has been a person of good moral character for the five-year statutory period before filing a naturalization application until the time the applicant becomes a naturalized United States citizen. 8 U.S.C. § 1427(a); 8 C.F.R. § 316.10(a)(i).

158. On or about October 5, 2005, Ms. Murad/Zaman filed her Form N-400, Application for Naturalization; and she naturalized on April 21, 2006.

159. Thus, to be eligible for naturalization, Ms. Murad/Zaman was required to establish that she was a person of good moral character during her “statutory period” of from October 5, 2000 (five years prior to October 5, 2005), and April 21, 2006.

160. Ms. Murad/Zaman failed to show she was a person of good moral character during the statutory period, because she committed unlawful acts during that period that

1 adversely reflected on her good moral character with no extenuating circumstances that
2 would ameliorate or palliate her guilt.

3 161. During the statutory period, Ms. Murad/Zaman violated 18 U.S.C. §
4 1001(a)(1)-(3) by knowingly and willfully concealing in her naturalization application—a
5 matter within the jurisdiction of the executive branch of the Government of the United
6 States—that she had previously used a different identity (including a different name and a
7 different date of birth) to gain admission to the United States.

8 162. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
9 period when she completed and filed her naturalization application by stating in that
10 application that she had never used any other names other than Tania Rahman Murad and
11 Tania Rahman to be admitted to the United States.

12 163. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
13 period when she completed and filed her naturalization application by stating in that
14 application that she had been a lawful permanent resident of the United States for at least
15 five years.

16 164. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
17 period when she completed and filed her naturalization application by stating in that
18 application that she had never committed a crime or offense for which she was not
19 arrested.

20 165. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
21 period when she completed and filed her naturalization application by stating in that
22 application that she had never given false or misleading information to any U.S.
23 Government official while applying for any immigration benefit or to prevent deportation,
24 exclusion, or removal.

25 166. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
26 period when she completed and filed her naturalization application by stating in that
27 application that she had never lied to any U.S. Government official to gain entry or
28 admission into the United States.

1 167. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
2 period when she completed and filed her naturalization application by stating in that
3 application that no removal, exclusion, recission, or deportation proceedings were pending
4 against her.

5 168. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
6 period when she completed and filed her naturalization application by stating in that
7 application that she had never been ordered to be removed, excluded, or deported to the
8 United States.

9 169. Ms. Murad/Zaman violated 18 U.S.C. § 1001(a)(1)-(3) during the statutory
10 period when she completed and filed her naturalization application by stating in that
11 application that she had never applied for any kind of relief from removal, exclusion, or
12 deportation.

13 170. Ms. Murad/Zaman also violated 18 U.S.C. § 1546(a) and (b)(3) by
14 knowingly and willfully presenting a fraudulent application, namely, her application for
15 naturalization, and attesting to misrepresentations made under oath during her
16 naturalization interview.

17 171. Ms. Murad/Zaman violated 18 U.S.C. § 1546(a) and (b)(3) during the
18 statutory period when she completed and filed her naturalization application stating in that
19 application, and when she swore and testified, orally and under oath during her
20 naturalization interview on March 30, 2006, that her name was Tania Rahman Murad.

21 172. Ms. Murad/Zaman violated 18 U.S.C. § 1546(a) and (b)(3) during the
22 statutory period when she completed and filed her naturalization application stating in that
23 application, and when she swore and testified, orally and under oath during her
24 naturalization interview on March 30, 2006, that the only other name she had ever used
25 was Tania Rahman.

26 173. Ms. Murad/Zaman violated 18 U.S.C. § 1546(a) and (b)(3) during the
27 statutory period when she completed and filed her naturalization application stating in that
28 application, and when she swore and testified, orally and under oath during her

1 naturalization interview on March 30, 2006, that she had been a lawful permanent resident
2 of the United States for at least five years.

3 174. Ms. Murad/Zaman violated 18 U.S.C. § 1546(a) and (b)(3) during the
4 statutory period when she completed and filed her naturalization application stating in that
5 application, and when she swore and testified, orally and under oath during her
6 naturalization interview on March 30, 2006, that she had never given false or misleading
7 information to any U.S. Government official while applying for any immigration benefit
8 or to prevent deportation, exclusion, or removal.

9 175. Ms. Murad/Zaman violated 18 U.S.C. § 1546(a) and (b)(3) during the
10 statutory period when she completed and filed her naturalization application stating in that
11 application, and when she swore and testified, orally and under oath during her
12 naturalization interview on March 30, 2006, that she had never lied to any U.S.
13 Government official to gain entry or admission to the United States.

14 176. No extenuating circumstances exist that would palliate Ms. Murad/Zaman's
15 guilt for violating 18 U.S.C. § 1001(a)(1)-(3) and 18 U.S.C. § 1546(a) and (b)(3). *See*
16 *Haciosmanoglu v. Tritten*, No. 21-2584, 2022 WL 781047, at *2-3 (8th Cir. Mar. 15,
17 2022); *see also United States v. Teng Jiao Zhou*, 815 F.3d 639, 644-645 (9th Cir. 2016).

18 177. Because Ms. Murad/Zaman committed unlawful acts during the statutory
19 period during which she was required to maintain good moral character, she was and
20 remains ineligible for naturalization under 8 U.S.C. §§ 1427(a)(1) and 1429.

21 178. Because she was ineligible to naturalize, Ms. Murad/Zaman illegally
22 procured her citizenship.

23 179. Because Ms. Murad/Zaman illegally procured her citizenship, her
24 citizenship is subject to revocation under 8 U.S.C. § 1451(a).

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COUNT IV

**PROCUREMENT OF CITIZENSHIP BY CONCEALMENT OF A MATERIAL
FACT OR WILLFUL MISREPRESENTATION**

180. The United States re-alleges and incorporates by reference the factual and legal allegations contained in Sections I through V of this Complaint.

181. Under 8 U.S.C. § 1451(a), Ms. Murad/Zaman's citizenship is subject to revocation and her certificate of naturalization is subject to cancellation if she procured her naturalization by concealment of material facts or by willful misrepresentation.

182. As discussed above, throughout the naturalization process, Ms. Murad/Zaman willfully misrepresented and concealed material facts, including facts related to her use of an alternate identity and her immigration history.

183. Ms. Murad/Zaman misrepresented on her Form N-400 and later testified falsely at her naturalization interview before a USCIS adjudicator that her name was Tania Rahman Murad.

184. Ms. Murad/Zaman misrepresented on her Form N-400 and later testified falsely at her naturalization interview before a USCIS adjudicator that the only other name she had ever used was Tania Rahman.

185. Ms. Murad/Zaman misrepresented on her Form N-400 and later testified falsely at her naturalization interview before a USCIS adjudicator that she had been a lawful permanent resident of the United States for at least five years.

186. Ms. Murad/Zaman misrepresented on her Form N-400 and later testified falsely at her naturalization interview before a USCIS adjudicator that she had never given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal.

187. Ms. Murad/Zaman misrepresented on her Form N-400 and later testified falsely at her naturalization interview before a USCIS adjudicator that she had never lied to any U.S. Government official to gain entry or admission to the United States.

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1 188. Ms. Murad/Zaman made these misrepresentations and concealments
2 voluntarily, despite knowing that such representations were false and misleading.

3 189. Accordingly, Ms. Murad/Zaman made these representations willfully.

4 190. Ms. Murad/Zaman's false statements and testimony about these matters
5 were material to determining her eligibility for naturalization.

6 191. Ms. Murad/Zaman's false statements and testimony had a natural tendency
7 to influence a decision by USCIS to approve her Form N-400.

8 192. In fact, as shown above, the concealed and misrepresented facts rendered
9 Ms. Murad/Zaman ineligible for naturalization.

10 193. USCIS would have denied Ms. Murad/Zaman's N-400 application had she
11 been truthful.

12 194. Ms. Murad/Zaman therefore procured her naturalization by concealment of
13 material facts and willful misrepresentations.

14 195. Because Ms. Murad/Zaman procured her naturalization by concealment of
15 material facts and willful misrepresentations, her citizenship is subject to revocation under
16 8 U.S.C. § 1451(a).

17 **COUNT V**

18 **ILLEGAL PROCUREMENT OF NATURALIZATION**
19 **Noncitizen Ordered Removed**

20 196. The United States re-alleges and incorporates by reference the factual and
21 legal allegations contained in Sections I through IV of this Complaint.

22 197. An individual who departs the United States while subject to an order of
23 removal or deportation is inadmissible for ten years after the date of departure from the
24 United States. 8 U.S.C. § 1182(a)(9)(A)(ii).

25 198. Ms. Murad/Zaman was subject to an order of removal in 1999 and departed
26 the United States, returning 29 days later, in 2000.

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1 199. Because Ms. Murad/Zaman was subject to an order of removal in 1999 and
2 departed the United States in 2000, she was inadmissible under 8 U.S.C. §
3 1182(a)(9)(A)(ii) at the time of her naturalization in 2006.

4 200. Because Ms. Murad/Zaman was inadmissible, she was ineligible for
5 naturalization under 8 U.S.C. § 1429.

6 201. Because Ms. Murad/Zaman was ineligible for naturalization, she illegally
7 procured her naturalization.

8 202. Because Ms. Murad/Zaman illegally procured her naturalization, her
9 naturalization is subject to revocation under 8 U.S.C. § 1451(a).

10 **PRAYER FOR RELIEF**

11 **WHEREFORE**, the United States of America respectfully requests:

12 (1) A declaration that Ms. Murad/Zaman procured her citizenship illegally;

13 (2) A declaration that Ms. Murad/Zaman procured her citizenship by
14 concealment of material facts and by willful misrepresentation;

15 (3) Judgment revoking and setting aside the order admitting Ms. Murad/Zaman
16 to citizenship and canceling Certificate of Naturalization No.  effective as of the
17 original date of the order and certificate, April 21, 2006.

18 (4) Judgment forever restraining and enjoining Ms. Murad/Zaman from
19 claiming any rights, privileges, benefits, or advantages related to United States citizenship
20 that he obtained as a result of her April 21, 2006, naturalization;

21 (5) Judgment requiring Ms. Murad/Zaman to surrender and deliver, within 10
22 days of the entry of judgment against her, her Certificate of Naturalization No. 
23 and any copies thereof in her possession—and to make good faith efforts to recover and
24 immediately surrender any copies thereof that she knows are in the possession of others—
25 to the Acting Attorney General through his designee, including undersigned counsel;

26 (6) Judgment requiring Ms. Murad/Zaman to immediately surrender and
27 deliver, within 10 days of entry of Judgment, any other indicia of United States
28 citizenship, including, but not limited to, United States passports (whether valid or

1 expired), United States passport cards (whether valid or expired), and Enhanced Driver's
2 Licenses (whether valid or expired), and other relevant documents, whether current or
3 expired, and any copies thereof in her possession or control—and to make good faith
4 efforts to recover and then surrender any copies thereof that she knows are in the
5 possession or control of others—to the Acting Attorney General through his designee,
6 including undersigned counsel; and

7 (7) Judgment granting the United States such other relief that may be lawful
8 and proper in this case.

9 RESPECTFULLY SUBMITTED August 7, 2026.

10
11 TIMOTHY COURCHINE
12 United States Attorney
13 District of Arizona

14 *s/ Lon R. Leavitt*

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LON R. LEAVITT
16 Assistant United States Attorney
17 *Counsel for the United States of America*
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